



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Horacio Tablada, Secretary
Suzanne E. Dorsey, Deputy Secretary

October 19, 2022

Brian C. Anderson, Chief
State Agreement and Liaison Programs Branch
Division of Materials Safety, Security, State, and Tribal Programs
Office of Nuclear Material Safety and Safeguards
US Nuclear Regulatory Commission (NRC)
Washington DC 20555-0001

**RE: Maryland's Response to NRC's 2022 Draft Integrated Materials Performance
Evaluation Program (IMPEP) Report**

Dear Mr. Anderson:

Please find enclosed the Maryland Department of the Environment's (MDE) response to the draft report and corrective action regarding the recommendation from the US Nuclear Regulatory Commission's Integrated Materials Performance Evaluation Program (IMPEP) follow-up review conducted August 23-25, 2022. On behalf of the MDE Secretary and the RHP staff, I thank the NRC and the IMPEP audit team for their expertise, professionalism, competence, and patience during the review.

Maryland firmly supports the IMPEP review process and will continue to improve the adequacy and compatibility of our Program as we further our mission to protect both occupational staff and the public against the hazards of ionizing radiation. We are looking forward to discussing the results of the IMPEP review during the virtual Management Review Board meeting on December 8, 2022. Should you have any questions regarding this response please contact Eva Nair at 410-537-3300 or by email at eva.nair@maryland.gov.

Sincerely,

Horacio Tablada
Secretary

Enclosure: Maryland's Response to NRC's 2022 Draft IMPEP Review Report

STATUS of CORRECTIVE ACTION REGARDING 2022 IMPEP TEAM RECOMMENDATIONS

IMPEP Team 2021 Recommendation 1 (ongoing): Review the qualifications of all radiation safety officers (RSOs), authorized users (AUs), and authorized medical physicists (AMPs) listed on their medical licenses to ensure that they meet the qualifications in accordance with Maryland's regulations for medical use of byproduct material.

Status: As noted in your draft report, we continue to make progress in evaluating the qualifications for Priority 2, 3, and 5 licenses. We will provide updated numbers at the Management Review Board meeting on December 8, 2022.

IMPEP Team Recommendation 2: Update licensing procedures to ensure the reviewer conducts a thorough analysis of the licensee's inspection and enforcement history of renewal applications and that Maryland conduct training on the updated procedures.

Status: On August 29, 2022, the Radiological Health Program (RHP) updated the cover sheet, that is placed with each license renewal, to denote that inspection and enforcement history will be checked as part of the review of the license renewal application. All license reviewers were made aware of this process. We are in the process of finalizing the licensing procedure to reflect this change.

RESPONSE to 2022 IMPEP TEAM's DRAFT REPORT COMMENTS

On Page 4 in item 3.1 "Technical Quality of Licensing Actions", under Evaluation-1st bullet, it states that reviews of renewal applications did not demonstrate a thorough analysis of a licensee's inspection and enforcement history. This was deemed to be a new recommendation. For clarification purposes, please note it has been a longstanding requirement of all license reviewers to review the license folder in its entirety, which includes the past inspection reports and any enforcement history. This check has not been documented on the cover sheet but as noted has been performed as part of the license renewal review. To address the recommendation, we have added this check to the cover sheet.